

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

GLOBAL PLASMA SOLUTIONS,

Plaintiff,

v.

ELSEVIER INC. and ELSEVIER LTD.,

Defendants.

Case No. 3:22-cv-00034-RJC-DCK

**MOTION OF DEFENDANTS ELSEVIER INC. AND ELSEVIER LTD.
TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT FOR
FAILURE TO STATE A CLAIM UPON WHICH RELIEF MAY BE GRANTED**

Defendants Elsevier Inc. and Elsevier Ltd. hereby respectfully move that the Court dismiss the Complaint filed against them by plaintiff Global Plasma Solutions, Inc. pursuant to Fed. R. Civ. P. 12(b)(6), for failure to state a claim upon which relief may be granted.

This Motion is based upon the Memorandum submitted herewith and Exhibits A through M attached hereto.

Respectfully submitted,

Dated: June 30, 2023

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